

IN THE SUPERIOR COURT CARROLL COUNTY

STATE OF GEORGIA

RITA MEEKS, individually and as Administratrix )  
of the Estate of ALAN HEMBREE, )

Plaintiff, )

vs. )

EULUS HOLBERT KEOWN, JR., )  
ROBERT LYNN NEWCOMB, CELADON )  
TRUCKING SERVICES, INC., and WABASH )  
NATIONAL CORPORATION, )

Defendants. )

CIVIL ACTION FILE  
NO. 15CV01044

**PLAINTIFF'S NOTICE OF TAKING DEPOSITION**

**TO: Robert Lynn Newcomb  
c/o John D. Dixon  
Dennis, Corry, Porter & Smith, LLP  
3535 Piedmont Road, NE  
14 Piedmont Center, Suite 900  
Atlanta, GA 30305**


PLEASE TAKE NOTICE that pursuant to O.C.G.A. § 9-11-30, Plaintiff in the above-captioned matter will take the deposition upon oral examination of Robert Lynn Newcomb, on Monday, February 22, 2016, at 11:00 a.m. at the office of John D. Dixon, Dennis, Corry, Porter, and Smith, LLP, located at 3535 Piedmont Road, NE 14 Piedmont Center, Suite 900, Atlanta, Georgia 30305, before an officer duly sworn for the purposes of use at trial, cross-examination, and for such other purposes authorized by the Georgia Civil Practice Act.

The deposition will be taken before an authorized court reporter or before some other officer duly authorized by law to administer oaths. The deposition will continue from day to day until its completion.

You are invited to attend and examine the witness.



This 28<sup>th</sup> day of January, 2016.



Matthew E. Cook  
Georgia Bar No. 184399  
Kate S. Cook  
Georgia Bar No. 280584  
COOK LAW GROUP, LLC  
P.O. Box 2415  
Gainesville, Georgia 30503  
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***Attorneys for Plaintiff***

IN THE SUPERIOR COURT CARROLL COUNTY

STATE OF GEORGIA

RITA MEEKS, individually and as Administratrix )  
of the Estate of ALAN HEMBREE, )

Plaintiff, )

vs. )

CIVIL ACTION FILE  
NO. 15CV01044

EULUS HOLBERT KEOWN, JR., )  
ROBERT LYNN NEWCOMB, CELADON )  
TRUCKING SERVICES, INC., and WABASH )  
NATIONAL CORPORATION, )

Defendants. )

**CERTIFICATE OF SERVICE**

The undersigned, attorney for Plaintiff in the above-styled case, hereby certifies that this day all parties have been served with a copy of the within and foregoing by STATUTORY ELECTRONIC SERVICE and/or United States Mail with proper postage affixed thereto and addressed as follows:

R. Christopher Harrison  
Downey & Cleveland, LLP  
[harrison@downeycleveland.com](mailto:harrison@downeycleveland.com)  
*Attorney for Defendant Keown*

John D. Dixon  
Dennis, Corry, Porter & Smith, LLP  
3535 Piedmont Road, NE  
14 Piedmont Center, Suite 900  
Atlanta, GA 30305  
*Attorney for Defendants Newcomb & Celadon Trucking Services, Inc.*

Fred Valz, III  
William Underwood  
Carlock, Copeland & Stair, LLP  
P.O. Box 56887  
Atlanta, GA 30303  
*Attorneys for GEICO Indemnity Company*

Scott Bonder  
Joseph A. White  
Fried & Bonder, LLC  
White Provision, Suite 305  
1170 Howell Mill Road, NW  
Atlanta, GA 30318

Paul Jefferson  
Jefferson & Brewer, LLC  
300 N. Meridian Street, Suite 220  
Indianapolis, IN 46204  
*Attorneys for Defendant Wabash National Corporation*

Dated this, the 28<sup>th</sup> day of January, 2016.

  
\_\_\_\_\_  
Matthew E. Cook

# COOK LAW GROUP, LLC

---

## ATTORNEYS AT LAW

Matthew E. Cook  
matt@cook-lawgroup.com

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Gainesville, GA 30503  
(678) 928-3899 (o)  
(888) 612-0589 (f)

Kate S. Cook  
kate@cook-lawgroup.com

January 28, 2016

Alan J. Lee, Clerk  
Superior Court of Carroll County  
P.O. Box 1620  
Carrollton, GA 30112

Re: *Meeks v Keown, et al.*  
Superior Court of Carroll County  
Civil Action No. 15CV01044

Dear Mr. Lee:

Please find enclosed an original and one (1) copy of Plaintiff's Notice of Taking Deposition concerning the above-referenced action. Kindly file the original and return the copy to me stamped "filed" in the self-addressed stamped envelope provided.

I appreciate your assistance in this matter.

Sincerely,  
COOK LAW GROUP, LLC



Kimberly Adams

/kaa  
Enclosures

cc: R. Christopher Harrison  
John D. Dixon  
Fred Valz, III / William Underwood  
Scott Bonder / Joseph A. White  
Paul Jefferson  
Chris Adams  
Jan P. Cohen

500 Jesse Jewell Parkway  
Suite 201  
Gainesville, GA 30501

IN THE SUPERIOR COURT CARROLL COUNTY  
STATE OF GEORGIA

RITA MEEKS, individually and as Administratrix )  
of the Estate of ALAN HEMBREE, )

Plaintiff, )

vs. )

EULUS HOLBERT KEOWN, JR., )  
ROBERT LYNN NEWCOMB, CELADON )  
TRUCKING SERVICES, INC., and WABASH )  
NATIONAL CORPORATION, )

Defendants. )

CIVIL ACTION FILE  
NO. 15CV01044

**PLAINTIFF'S AMENDED NOTICE OF TAKING DEPOSITION**

**TO: Robert Lynn Newcomb  
c/o John D. Dixon  
Dennis, Corry, Porter & Smith, LLP  
3535 Piedmont Road, NE  
14 Piedmont Center, Suite 900  
Atlanta, GA 30305**

PLEASE TAKE NOTICE that pursuant to O.C.G.A. § 9-11-30, Plaintiff in the above-captioned matter will take the deposition upon oral examination of Robert Lynn Newcomb, on Friday, July 22, 2016, at 11:00 a.m. at the office of John D. Dixon, Dennis, Corry, Porter, and Smith, LLP, located at 3535 Piedmont Road, NE 14 Piedmont Center, Suite 900, Atlanta, Georgia 30305, before an officer duly sworn for the purposes of use at trial, cross-examination, and for such other purposes authorized by the Georgia Civil Practice Act.

The deposition will be taken before an authorized court reporter or before some other officer duly authorized by law to administer oaths. The deposition will continue from day to day until its completion.

You are invited to attend and examine the witness.

This 1<sup>st</sup> day of June, 2016.



Matthew E. Cook  
Georgia Bar No. 184399  
Kate S. Cook  
Georgia Bar No. 280584  
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P.O. Box 2415  
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[kate@cook-lawgroup.com](mailto:kate@cook-lawgroup.com)

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Jan P. Cohen  
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Email: [jcohen@attorneykennugent.com](mailto:jcohen@attorneykennugent.com)

Jonathan Lee Greer  
Greer Tisinger, LLC  
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770-836-8327 - Phone  
770-838-9756 - Fax  
[jon@greertisingerlaw.com](mailto:jon@greertisingerlaw.com)

*Attorneys for Plaintiff*

IN THE SUPERIOR COURT CARROLL COUNTY  
STATE OF GEORGIA

RITA MEEKS, individually and as Administratrix	)	
of the Estate of ALAN HEMBREE,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION FILE
vs.	)	NO. 15CV01044
	)	
EULUS HOLBERT KEOWN, JR.,	)	
ROBERT LYNN NEWCOMB, CELADON	)	
TRUCKING SERVICES, INC., and WABASH	)	
NATIONAL CORPORATION,	)	
	)	
Defendants.	)	

**CERTIFICATE OF SERVICE**

The undersigned, attorney for Plaintiff in the above-styled case, hereby certifies that this day all parties have been served with a copy of the within and foregoing by STATUTORY ELECTRONIC SERVICE and/or United States Mail with proper postage affixed thereto and addressed as follows:

R. Christopher Harrison  
Downey & Cleveland, LLP  
[harrison@downeycleveland.com](mailto:harrison@downeycleveland.com)  
*Attorney for Defendant Keown*

John D. Dixon  
Dennis, Corry, Porter & Smith, LLP  
3535 Piedmont Road, NE  
14 Piedmont Center, Suite 900  
Atlanta, GA 30305  
*Attorney for Defendants Newcomb & Celadon Trucking Services, Inc.*

Fred Valz, III  
William Underwood  
Carlock, Copeland & Stair, LLP  
P.O. Box 56887  
Atlanta, GA 30303  
*Attorneys for GEICO Indemnity Company*



Scott Bonder  
Joseph A. White  
Fried & Bonder, LLC  
White Provision, Suite 305  
1170 Howell Mill Road, NW  
Atlanta, GA 30318

Paul Jefferson  
Jefferson & Brewer, LLC  
300 N. Meridian Street, Suite 220  
Indianapolis, IN 46204  
*Attorneys for Defendant Wabash National Corporation*

Dated this, the 1<sup>st</sup> day of June, 2016.

A handwritten signature in black ink, appearing to read 'Matthew E. Cook', is written over a horizontal line.

Matthew E. Cook  
Kate S. Cook

# COOK LAW GROUP, LLC

---

## ATTORNEYS AT LAW

Matthew E. Cook  
matt@cook-lawgroup.com

P.O. Box 2415  
Gainesville, GA 30503  
(678) 928-3899 (o)  
(888) 612-0589 (f)

Kate S. Cook  
kate@cook-lawgroup.com

June 1, 2016

Alan J. Lee, Clerk  
Superior Court of Carroll County  
P.O. Box 1620  
Carrollton, GA 30112

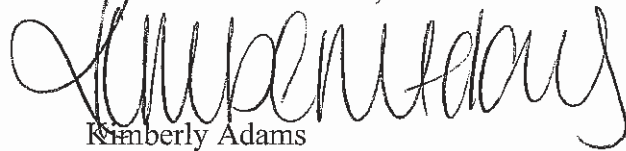
Re: *Meeks v Keown, et al.*  
Superior Court of Carroll County  
Civil Action No. 15CV01044

Dear Mr. Lee:

Please find enclosed an original and one (1) copy of Plaintiff's Amended Notice of Taking Deposition concerning the above-referenced action. Kindly file the original and return the copy to me stamped "filed" in the self-addressed stamped envelope provided.

I appreciate your assistance in this matter.

Sincerely,  
COOK LAW GROUP, LLC




Kimberly Adams

/kaa  
Enclosures

cc: R. Christopher Harrison  
John D. Dixon  
Fred Valz, III / William Underwood  
Scott Bonder / Joseph A. White  
Paul Jefferson  
Chris Adams  
Jan P. Cohen  
Jon Greer

800 Jesse Jewell Parkway, SW  
Gainesville, GA 30501

FILED IN OFFICE  
CLERK OF SUPERIOR COURT  
CARROLL COUNTY, GEORGIA  
**SUCV2015001044**  
J024  
NOV 11, 2016 02:31 PM  
  
Alan Lee, Clerk  
Carroll County, Georgia

IN THE SUPERIOR COURT OF CARROLL COUNTY

STATE OF GEORGIA

RITA MEEKS, Individually, and  
as Administratrix of the Estate of  
ALAN HEMBREE,  
*Plaintiffs,*

vs.

EULUS HOLBERT KEOWN, JR.,  
ROBERT LYNN NEWCOMB,  
CELADON TRUCKING SERVICES,  
INC., and WABASH NATIONAL  
CORPORATION,  
*Defendants.*

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CIVIL ACTION  
FILE NO. 15CV01044

JUDGE: Kirby

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PLAINTIFFS' NOTICE OF TAKING DEPOSITIONS OF  
CHASE WELCH AND ROBERT LYNN NEWCOMB

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**TO: Celadon Trucking Services, Inc.: The following person(s) will be  
deposed:**

1. Chase Welch, Safety Director
2. Robert Lynn Newcomb, Driver

**PLEASE TAKE NOTICE** that pursuant to O.C.G.A. S 9-11-30, 9-11-34, and 9-11-45, Plaintiffs in the above-captioned matter will take the deposition upon oral examination of the Celadon Trucking Services, Inc.' Representative(s) referenced above beginning Tuesday, November 22, 2016 at 8:30 a.m., Celadon Corporate Office, 9503 East 33<sup>rd</sup> Street, Indianapolis, IN 46235, before an officer duly authorized by law to administer oaths and take deposition testimony for the purpose of discovery, for use in this action, or for such other purposes as are permitted by the Georgia Civil Practice Act.

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*Meeks v. Wabash*

Notice of Taking Depositions of Chase Welch and Robert Lynn Newcomb  
Superior Court of Carroll County – CAFN: 15CV01044


The deposition will continue from day to day until its completion including November 23, 2016, if necessary.

You are invited to attend and examine the witness.

This 11<sup>th</sup> day of November, 2016.

GREER TISINGER, LLC

By:

  
Jon Greer  
Georgia Bar No. 107106  
**Counsel for Plaintiff**

210 South Street  
Carrollton, Georgia 30117  
Phone: (770) 836-8327  
Fax: (770) 838-9756  
[jon@greertisingerlaw.com](mailto:jon@greertisingerlaw.com)

IN THE SUPERIOR COURT OF CARROLL COUNTY  
STATE OF GEORGIA

RITA MEEKS, Individually, and  
as Administratrix of the Estate of  
ALAN HEMBREE,  
*Plaintiffs,*

vs.

EULUS HOLBERT KEOWN, JR.,  
ROBERT LYNN NEWCOMB,  
CELADON TRUCKING SERVICES,  
INC., and WABASH NATIONAL  
CORPORATION,  
*Defendants.*

\*  
\*  
\* CIVIL ACTION  
\* FILE NO. 15CV01044  
\*

\* JUDGE: Kirby  
\*

\*  
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\*  
\*  
\*  
\*

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CERTIFICATE OF SERVICE

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The undersigned, attorney for Plaintiffs in the above-styled case, hereby certifies that this day all parties have been served with a copy of the within and foregoing by STATUTORY ELECTRONIC SERVICE and/or United States Mail with proper postage affixed thereto and addressed as follows:

Christopher J. Adams, Esq.  
Jan P. Cohen, Esq.  
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500 Jesse Jewell Parkway  
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Gainesville, Georgia 30501

R. Christopher Harrison, Esq.  
DOWNEY & CLEVELAND  
288 Washington Avenue  
Marietta, Georgia 30060

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*Meeks v. Wabash*

Notice of Taking Depositions of Chase Welch and Robert Lynn Newcomb  
Superior Court of Carroll County – CAFN: 15CV01044

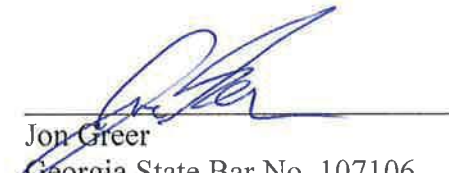
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Atlanta, Georgia 30305

Paul Jefferson, Esq.  
JEFFERSON & BREWER  
300 N. Main Street  
Suite 220  
Indianapolis, Indiana 46204

This the 11<sup>th</sup> day of November, 2016.

GREER TISINGER, LLC

  
Jon Greer  
Georgia State Bar No. 107106  
**Counsel for Plaintiff**

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